UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

OCT 18 2012

Mr. Joseph J. Martens
Commissioner
New York State Department of Environmental Conservation
Albany, NY 12233-1010

Dear Mr. Martens:

This is in response to the Annual Monitoring Network Review Plan (Plan) of 2012 for New York State's ambient air monitoring program which you submitted to the United States Environmental Protection Agency (EPA) on July 2, 2012. New York provided for public review of the plan in two public notices dated May 23, 2012 and September 12, 2012. This is to inform you that EPA Region 2 has reviewed the Plan for consistency with 40 Code of Federal Regulations Part 58.10 and is approving that portion of the Plan related to the final network design.

The portion of the monitoring network plan involving the National Core multi-pollutant monitoring stations, $PM_{2.5}$ Speciation Trends Network stations, and Photochemical Assessment Monitoring Stations, and the NO_2 near roadway network design are subject to approval by the EPA Administrator. Accordingly, we will forward that portion of New York's Plan to EPA's Office of Air Quality Planning and Standards for review. My staff will work closely with our Headquarters counterparts and keep your staff informed of the progress of the review of that portion of the Plan.

New York currently has an extensive and comprehensive monitoring network for criteria pollutants, air toxics, acid deposition, and meteorological data. In an effort to optimize and maintain such a comprehensive network that addresses both regulatory and community needs, New York has proposed to:

- substitute PM_{10} lead for TSP-lead at the Bronx and Rochester sites;
- close 12 monitoring site locations (Belleayre, Camden, Westfield, Nick's Lake, Syracuse COM, La Tourette, IS 293, PS 154, Manhattanville Post Office, Niagara Falls, Elmira and Grafton);
- end sampling of certain parameters at 5 other sites (Eisenhower Park, Mt. Ninham, PS 19, Amherst, and Bronx);
- relocate the Camp Georgetown site due to an emergency caused by loss of power service; and,
- relocate 13 other parameters.

As for the substitution of PM_{10} lead for TSP-lead at the Bronx and Rochester sites, since 2007 the maximum values for PM_{10} lead at the Bronx and Rochester sites were 0.045 ug/m^3 and 0.020 ug/m^3 respectively. Because these values are lower than the 0.1 ug/m^3 standard for lead, EPA is approving the monitoring substitution of TSP-lead for PM_{10} lead.

I applaud you and your staff on your continued efforts to address community concerns with the ongoing monitoring in Tonawanda and the Community Air Screening Project for toxics. These actions demonstrate the State's commitment to working with the citizens to address potential air quality issues. New York should also be commended for establishing a mercury baseline air monitoring program to

track progress of its initiative to control mercury through establishment of regulations to control mercury from coal-fired powered plants in a two-phase approach, which started in 2010 and will continue with Phase 2 taking effect on January 1, 2015.

To summarize, EPA concurs with most of the changes presented in the 2012 Plan. Additional details of EPA's review are attached. If you have further questions, please contact me at (212) 637-3736 or your staff can contact Mr. Richard Ruvo at (212) 637-4014 or Ms. Mazeeda Khan at (212) 637-3715 of our Air Programs Branch.

Sincerely,

John Filippelli
Director
Clean Air and Sustainability Division

Enclosures

cc: David Shaw, NYSDEC
Larry Sitzman, NYSDEC
Dirk Felton, NYSDEC
Brian Lay, NYSDEC
Mo SiuHong, NYSDEC
David Wheeler, NYSDEC

ENCLOSURE 1
NEW YORK MONITORING NETWORK REVIEW PLAN OF 2012 – EPA REVIEW
MONITORING CLOSURES

New York currently has a network of 33 ozone, 23 SO_2, 6 NO_x (including 3 NO_y), 8 CO, 18 $PM_{2.5}$ filter based samplers, 28 $PM_{2.5}$ continuous samplers, 5 PM_{10} filter based samplers,1 PM_{10} continuous samplers, 7 Carbon Speciated Network samplers, 2 speciated carbon, 2 black carbon, 2 speciated mercury, 3 particulate sulfate, 16 acid deposition, 4 TSP-lead, 1 PM_{10} lead, 2 PM_{10} speciated metals, 1 methane/non-methane, 11 air toxics, 9 carbonyls, 2 PAMS, 2 hexavalent Chromium, 2 PAH and 23 meteorological stations.

BELLEAYRE

NYSDEC recommendation – Site closure.

Background – This site has O_3, SO_2, precipitation, relative humidity, temperature, pressure, wind speed/direction and acid deposition parameters. Biscuit Brook is a National Acid Deposition Precipitation (NADP) site 10 miles south of Belleayre. Historically O_3 and SO_2 data have shown concentrations to be below levels of concern. The 8 hour O_3 2009, 2010, and 2011 design values are 0.069 ppm, 0.068 ppm, and 0.069 ppm, respectively. The 1 hour SO_2 2009, 2010, and 2011 design values are 12 ppb, 9 ppb, and 8 ppb, respectively.

EPA response – EPA concurs.
Acid deposition will be represented by Biscuit Brook. O_3 and SO_2 parameters are low reading parameters. Closure of this site will consolidate the network. The site closure is supported by EPA.

CAMDEN

NYSDEC recommendation – Site closure.

Background – This site has O_3 and pressure parameters. This site consistently shows the lowest observed O_3 levels in the entire State. The closest O_3 site is East Syracuse, 24 miles southwest of Camden. Camden 8 hour O_3 2009, 2010, and 2011 design values are 0.064 ppm, 0.061 ppm, and 0.059 ppm, respectively. East Syracuse 8 hour O_3 2009, 2010, and 2011 design values are 0.070 ppm, 0.068 ppm, and 0.067 ppm, respectively. Data from recent years show that the ozone concentrations observed at the Camden monitor are consistent with those observed at East Syracuse, and are below the NAAQS by a safe margin.

EPA response – EPA concurs.
This is a low reading monitor and closure of this site will consolidate the network. The site closure is supported by EPA.

CAMP GEORGETOWN

NYSDEC recommendation – Site closure. Relocation to another site in the near future.

Background – This site has O_3, SO_2, precipitation, relative humidity, temperature, barometric pressure, and acid deposition parameters. The site ceased operation in April 2012 when power was shut off when the state correctional facility was closed.

EPA response – EPA concurs.
This is an emergency shutdown. The site closure and efforts to relocate are supported by EPA.

ELMIRA

NYSDEC recommendation – Site closure. Relocate acid deposition to Pinnacle.

Background – This site has O_3, SO_2, wind speed/direction, relative humidity, precipitation, temperature, barometric pressure, and acid deposition parameters. The acid deposition parameter will be relocated to Pinnacle. The remaining parameters already exist at Pinnacle. It is anticipated that an additional full suite monitoring site in the Binghamton area will be established should the Marcellus Shale gas drilling go forward. Pinnacle is 21 miles west of Elmira. Elmira 8 hour O_3 2009, 2010, 2011 design values are 0.069 ppm, 0.067 ppm, and 0.066 ppm, respectively. Pinnacle 8 hour O_3 2009, 2010, 2011 design values are 0.068 ppm, 0.066 ppm, and 0.065 ppm, respectively. Elmira 1 hour SO_2 2009, 2010, 2011 design values are 20 ppb, 16 ppb, and 13 ppb, respectively. Pinnacle 1 hour SO_2 2009, 2010, 2011 design values are 24 ppb, 20 ppb, and 16 ppb, respectively. Data from recent years show that the concentration of Elmira monitored parameters are consistent with those observed at the nearby Pinnacle station, and are below NAAQS by a safe margin.

EPA response – EPA concurs.
This is a low reading monitor and closure of this site will consolidate the network. The site closure is supported by EPA.

GRAFTON LAKES STATE PARK

NYSDEC recommendation – Site closure. Relocate acid deposition to Loudonville.

Background – This site has O_3, SO_2, wind speed/direction, precipitation, relative humidity, temperature, barometric pressure, and acid deposition parameters. Acid deposition will be relocated to Loudonville. O_3 and SO_2 monitoring already exist at Loudonville. O_3 monitoring also exists at Stillwater. Loudonville is 16 miles southwest of Grafton and Stillwater is 63 northwest of Grafton. Grafton 8 hour O_3 2009, 2010, 2011 design values are 0.073 ppm, 0.072 ppm, and 0.067 ppm, respectively. Loudonville 8 hour O_3 2009, 2010, 2011 design values are 0.072 ppm, 0.071 ppm, and 0.067 ppm, respectively. Stillwater 8 hour O_3 2009, 2010, 2011 design values are 0.075 ppm, 0.072 ppm, and 0.068 ppm, respectively. Grafton 1 hour SO_2 2009, 2010, 2011 design values are 15 ppb, 12 ppb, and 10 ppb, respectively. Loudonville 1 hour SO_2 2009, 2010, 2011 design values are 20 ppb, 18 ppb, and 16 ppb, respectively. Data from recent years show that the concentration of Grafton monitored parameters are consistent with those observed at nearby area stations at Loudonville and Stillwater, and are below NAAQS by a safe margin.

EPA response – EPA concurs.
This site will consolidate the network. The site closure is supported by EPA.

IS 293

NYSDEC recommendation – Site closure.

Background – This site has $PM_{2.5}$ continuous parameter. There is a $PM_{2.5}$ continuous monitor at Division Street which is 10 miles north of IS 293. $PM_{2.5}$ 1 hour arithmetic means for IS 293 in 2009, 2010, 2011 are 11.12 ug/m^3, 10.87 ug/m^3, and 11.33 ug/m^3, respectively. $PM_{2.5}$ 1 hour arithmetic means for Division St. in 2009, 2010, 2011 are 11.86 ug/m^3, 11.48 ug/m^3, and 11.85 ug/m^3, respectively. Data from recent years at IS 193 show that the concentrations of monitored parameters are consistent with those observed at Division Street.

EPA response – EPA concurs.
This is a low reading monitor and closure of this site will consolidate the network. The site closure is supported by EPA.

La Tourette

NYSDEC recommendation – Site closure.

Background –This site has air toxics and carbonyls parameters. These parameters also exist at Fresh Kills West located 3 miles west of La Tourette. Data from recent years at La Tourette show that the concentrations of monitored parameters are consistent with those observed at the nearby Fresh Kills West site. The data collected at this site is redundant.

EPA response – EPA concurs.
Closure of this site will consolidate the network. The site closure is supported by EPA.

MANHATTANVILLE POST OFFICE

NYSDEC recommendation – Site closure.

Background – This site has $PM_{2.5}$ continuous parameter. This parameter is also located at CCNY 1 mile northeast of Manhattanville Post Office. $PM_{2.5}$ 1 hour arithmetic means for Manhattanville in 2009, 2010, 2011 are 11.86 ug/m^3, 11.48 ug/m^3, and 11.85 ug/m^3, respectively. $PM_{2.5}$ 1 hour arithmetic means for CCNY in 2009, 2010, 2011 are 11.38 ug/m^3, 11.09 ug/m^3, and 11.04 ug/m^3, respectively. Data from recent years show that the concentration of monitored parameters are consistent with those observed at the Loudonville and Grafton stations, and are below NAAQS by a safe margin.

EPA response – EPA concurs.
This is a low reading monitor and closure of this site will consolidate the network. The site closure is supported by EPA.

NIAGARA FALLS

NYSDEC recommendation – Site closure. Relocate toxics and PM_{10} to Buffalo, acid deposition and $PM_{2.5}$ FRM to Amherst.

Background – The site has SO_2, CO, $PM_{2.5}$ filter based, PM_{10} continuous, $PM_{2.5}$ continuous, toxics, carbonyls, acid deposition, wind speed/direction, precipitation, relative humidity, temperature, and

barometric pressure parameters. All the parameters will be shutdown with the exception of toxics and PM_{10} which will be relocated to Buffalo and acid deposition and $PM_{2.5}$ FRM which will be relocated to Amherst. Buffalo is 17 miles southeast of Niagara Falls. Amherst is 13 miles southeast of Niagara Falls. Niagara Falls 8 hour 2nd max CO values for 2009, 2010, 2011 are 1.1 ppm, 1.2 ppm, and 1.9 ppm, respectively. Buffalo 8 hour 2nd max CO values for 2009, 2010, 2011 are 1.1 ppm, 1.4 ppm, and 1.5 ppm, respectively. Niagara Falls 1 hour 2nd max SO_2 values for 2009, 2010, 2011 are 25.1 ppb, 23.0 ppb, and 15.9 ppb, respectively. Buffalo 1 hour 2nd max SO_2 values for 2009, 2010, 2011 are 28.0 ppb, 17.0 ppb, and 32.3 ppb, respectively. Niagara Falls 24 hour arithmetic mean $PM_{2.5}$ values for 2009, 2010, 2011 are 8.63 ug/m^3, 8.26 ug/m^3, and 8.19 ug/m^3, respectively. Buffalo 24 hour arithmetic mean $PM_{2.5}$ values for 2009, 2010, 2011 are 9.50 ug/m^3, 9.96 ug/m^3, 9.51 ug/m^3, respectively. Niagara Falls 1 hour arithmetic mean $PM_{2.5}$ values for 2009, 2010, 2011 are 9.40 ug/m^3, 9.56 ug/m^3, 10.17 ug/m^3, respectively. Buffalo 1 hour arithmetic mean $PM_{2.5}$ values for 2009, 2010, 2011 are 9.98 ug/m^3, 10.33 ug/m^3, 9.17 ug/m^3, respectively. Data from recent years show that the concentration of monitored parameters are consistent with those observed at Buffalo and Amherst stations, and are below NAAQS by a safe margin.

EPA response – EPA concurs.
This site has low reading parameters and closure of this site will consolidate the network. The site closure is supported by EPA.

NICK'S LAKE

NYSDEC recommendation – Site closure.

Background – This site has O_3, SO_2, precipitation, relative humidity, temperature, barometric pressure, and acid deposition parameters. Acid deposition is monitored at the NADP site, Moss Lake, 10 miles northeast from Nick's Lake. Piseco Lake is 29 miles southeast of Nick's Lake. Nick's Lake 8 hour O_3 2009, 2010, 2011 design values are 0.070 ppm, 0.067 ppm, and 0.063 ppm, respectively. Piseco Lake 8 hour O_3 2009, 2010, 2011 design values are 0.070 ppm, 0.068 ppm, and 0.066 ppm, respectively. Nick's Lake 1 hour SO_2 2009, 2010, 2011 design values are 9 ppb, 7 ppb, and 6 ppb, respectively. Piseco Lake 1 hour SO_2 2009, 2010, 2011 design values are 9 ppb, 7 ppb, and 6 ppb, respectively. Data from recent years show that the concentration of monitored parameters at Nick's Lake are consistent with those observed at Piseco Lake, and are below NAAQS by a safe margin. The data collected at this site is redundant.

EPA response – EPA concurs.
This site has low reading parameters and closure of this site will consolidate the network. The site closure is supported by EPA.

PS 154

NYSDEC recommendation – Site closure.

Background – This site has $PM_{2.5}$ continuous parameter. This parameter is also measured at IS 74, 2 miles east from PS 154. $PM_{2.5}$ 1 hour arithmetic means for PS 154 in 2009, 2010, 2011 are 12.00 ug/m^3, 11.92 ug/m^3, and 12.25 ug/m^3, respectively. $PM_{2.5}$ 1 hour arithmetic means for IS 74 in 2009, 2010, 2011 are 11.91 ug/m^3, 11.76 ug/m^3, and 12.94 ug/m^3, respectively. Data from recent years show that the

concentration of monitored parameters at PS 154 are consistent with those observed at IS 74 and are below NAAQS by a safe margin. The data collected at this site is redundant.

EPA response – EPA concurs.
This is a low reading monitor and closure of this site will consolidate the network. The site closure is supported by EPA.

SYRACUSE COM

NYSDEC recommendation – Site closure.

Background – This site has CO parameter. Based on New York's CO Maintenance Plan for the Syracuse area, this monitor is required to demonstrate low readings for this CBSA up to 2012. Once demonstrated, NYSDEC is allowed to close the site. Accordingly, NYSDEC requests to close the site in early 2013. The CO 1 hour standard is 35 ppm. At this site, CO 2nd max 1 hour for 2002 to 2011 are 3.4 ppm, 3.2 ppm, 3.0 ppm, 2.8 ppm, 2.8 ppm, 1.9 ppm, 1.9 ppm, 1.9 ppm, 1.8 ppm, and 2.0 ppm. The CO 8 hour standard is 9 ppm. CO 2nd max 8 hour for 2002 to 2011 are 2.1 ppm, 1.8 ppm, 1.4 ppm, 1.9 ppm, 1.4 ppm, 1.2 ppm, 1.4 ppm, 1.2 ppm, 1.4 ppm and 1.4 ppm.

EPA response – EPA concurs.
This is a low reading monitor and closure of this site will consolidate the network. The site closure is supported by EPA.

WESTFIELD

NYSDEC recommendation – site closure. Continue parameters at Dunkirk.

Background – This site has O_3, SO_2, PM2.5, precipitation, relative humidity, temperature, barometric pressure, and acid deposition parameters. Westfield is 20 miles southwest of Dunkirk. Westfield 8 hour O_3 2009, 2010, 2011 design values are 0.074 ppm, 0.072 ppm, and 0.072 ppm, respectively. Dunkirk 8 hour O_3 2009, 2010, 2011 design values are 0.079 ppm, 0.077 ppm, and 0.072 ppm, respectively. Westfield 1 hour SO_2 2009, 2010, 2011 design values are 29 ppb, 23 ppb, and 19 ppb, respectively. Dunkirk 1 hour SO_2 2009, 2010, 2011 design values are 50 ppb, 45 ppb, and 34 ppb, respectively. Data from recent years show that the concentration of Westfield monitored parameters are consistent with those observed at the Dunkirk station.

EPA response – EPA concurs.
Closure of this site will consolidate the network. Moving and continuing parameters at Dunkirk is supported by EPA.

ENCLOSURE 2
NEW YORK MONITORING NETWORK REVIEW PLAN OF 2012 – EPA REVIEW
MONITORING SITE CHANGES

AMHERST

NYSDEC recommendation – Discontinue NO_x.

Background – This site has NO, NO_2, NO_x, O_3, wind speed/direction, relative humidity, temperature, and barometric pressure parameters. These parameters are also located at Buffalo, 9 miles southwest from Amherst. The 1 hour arithmetic mean NO_x data at Amherst for 2009, 2010 and 2011 are 8.84 ppb, 10.04 ppb, and 10.95 ppb, respectively. The 1 hour arithmetic mean NO_x data for Buffalo at 2009, 2010 and 2011 are 23.35 ppb, 20.37 ppb, and 19.23 ppb, respectively. Data from recent years show that the concentration of monitored parameter at Amherst are consistently lower than that at Buffalo, and are below NAAQS by a safe margin.

EPA response – EPA concurs.
This is a low reading monitor and closure of this parameter will consolidate the network. The site closure is supported by EPA.

EISENHOWER PARK

NYSDEC recommendation –Discontinue acid deposition monitoring.

Background – This site has SO_2, $PM_{2.5}$ TEOM, acid deposition, meteorological, precipitation, relative humidity, temperature, and barometric pressure parameters. There is a NADP site at Cedar Beach, Southold 65 miles northeast from Eisenhower Park.

EPA response – EPA concurs.
This site will consolidate the network. The site closure is supported by EPA.

MORRISANIA II

NYSDEC recommendation – Relocate all NATTS parameters back to the designated site at IS 52. Morrisania II will become a single continuous $PM_{2.5}$ site once IS 52 is fully operational.

Background – This site has $PM_{2.5}$ FRM, PM_{10} FRM, PM_{10} metals, black carbon, PAH, carbonyls, and chromium parameters. Other than $PM_{2.5}$ continuous, the parameters will be moved to this site because of roof repair at IS 52. It is anticipated that the repairs will conclude in 2013 at which time all the parameters excluding $PM_{2.5}$ continuous will be relocated back to IS 52.

EPA response – EPA concurs.
The relocation of $PM_{2.5}$ FRM, PM_{10} FRM, PM_{10} metals, black carbon, PAH, carbonyls, and chromium parameters back to IS 52 will maintain IS 52 as the NATTS site and preserve the national trends.

MT. NINHAM

NYSDEC recommendation –Discontinue acid deposition monitoring.

Background – This site has O_3, SO_2, precipitation, relative humidity, temperature, barometric pressure, and acid deposition parameters. Acid deposition is also measured at the NADP site at West Point which is 19 miles southwest from Mt. Ninham.

EPA response – EPA concurs.
This site will consolidate the network. The site closure is supported by EPA.

NEW YORK BOTANICAL GARDEN

NYSDEC recommendation – discontinue continuous GC for PAMS measurements.

Background –This site has O_3, SO_2, low level SO_2, NO, NO_2, NO_x, CO, $PM_{2.5}$ FRM, NMOC total HC, PAMS precursor, toxics, carbonyl, mercury elemental/reactive gas, and precipitation MDN parameters. The GC is not required under current ozone nonattainment classification. Sensitivity deterioration and frequent failures have rendered the measurements unreliable and of limited value.

EPA response – EPA does not concur.
In 40 CFR part 58 Appendix D, Table D-6, two speciated VOC sites are required per area. The collection of data must be an hourly auto GC, eight 3 hour canisters or 1 morning and 1 afternoon canister with a 3 hour or less averaging time plus continuous total non-methane hydrocarbon. Queens College has VOC canisters on a 1/6 day schedule collecting 24 hour samples. New York Botanical had the only GC in the area plus VOC canisters on a 1/6 day schedule collecting 24 hour samples. EPA understands the failing condition of the GC, however, shutting down the GC at New York Botanical is not recommended. Region 2 will continue to work with OAQPS regarding issues with GC equipment.

PS 19

NYSDEC recommendation – Discontinue redundant PM_{10}.

Background – This site has $PM_{2.5}$ filter based, $PM_{2.5}$ continuous, and PM_{10} filter based parameters.

EPA response – EPA does not concur.

In 2010, EPA approved NYSDEC's recommendation to close its Madison Avenue site with the caveat that the area will be represented by PM_{10} filter based parameters at PS 19 and Division Street. PM_{10} in Manhattan is essential because of the SIP implications of the PM_{10} nonattainment area. Once NYSDEC has addressed this issue, EPA will reconsider shutting down the PM_{10} parameter at PS 19.